

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

JANE DOE and JOHN ROE,	:	
Plaintiffs,	:	
	:	No. 3:23-cv-1747
v.	:	
	:	JURY TRIAL DEMANDED
TEACHERS COUNCIL, INC.	:	
Defendant.	:	

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**MOTION FOR EXTENSION OF TIME TO ANSWER COMPLAINT**

NOW COMES Defendant, Teachers Council, by and through undersigned counsel, and moves this Honorable Court to enter an order extending the time to answer the Complaint by sixty days.

1. Movant is the Defendant, Teachers Council, a non-profit organization organized in Maryland.

2. Defendant has been and is currently represented by corporate counsel, Cornerstone Law Firm and Attorney Joel A. Ready of Reading, Pennsylvania. Counsel has represented Teachers Council in the prior EEOC and pending NLRB proceedings.

3. Teachers Council desires to continue its current representation in the present matter before the District of Oregon.

4. However, this will require admission *pro hoc vice*.


5. At the same time, Teachers Council is conferring with its insurer to determine if it will cover this employment claim and provide insurance-defense counsel.

6. Teachers Council therefore requests a sixty-day extension of the time for answering the Complaint.

7. Counsel has requested Plaintiffs' counsel to concur in this request, but he has declined and opposes this request.

WHEREFORE, Defendant, Teachers Council, respectfully requests this Honorable Court to grant the Motion and enter an Order extending the time for answering the Complaint by sixty days.

Date: December 8, 2023

Respectfully Submitted,  
By:   
Joel A. Ready, Esq.  
P.A. Attorney I.D. # 321966  
*Co-counsel for Defendant*